



Code *of* Conduct

LIVE
THE
PACIFIC *Life*
It Starts with ME

INTRODUCTION

A Message from Darryl Button

Our Values

Compliance and Ethics Officer Message

Ethical Decision-Making

Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other

Safe and Healthy Workplace

Alcohol, Drugs, and Weapons

Speaking Up

Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing

Bribery and Fraud

Conflicts of Interest

Respect and our Business Partners

Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation

Communication in the 21st Century

Ethical Innovation and Use of AI

Consumer Privacy and Protecting our Assets

Data Storage, Management & Deletion

Using Resources Wisely

POLICIES

A Message from Darryl Button

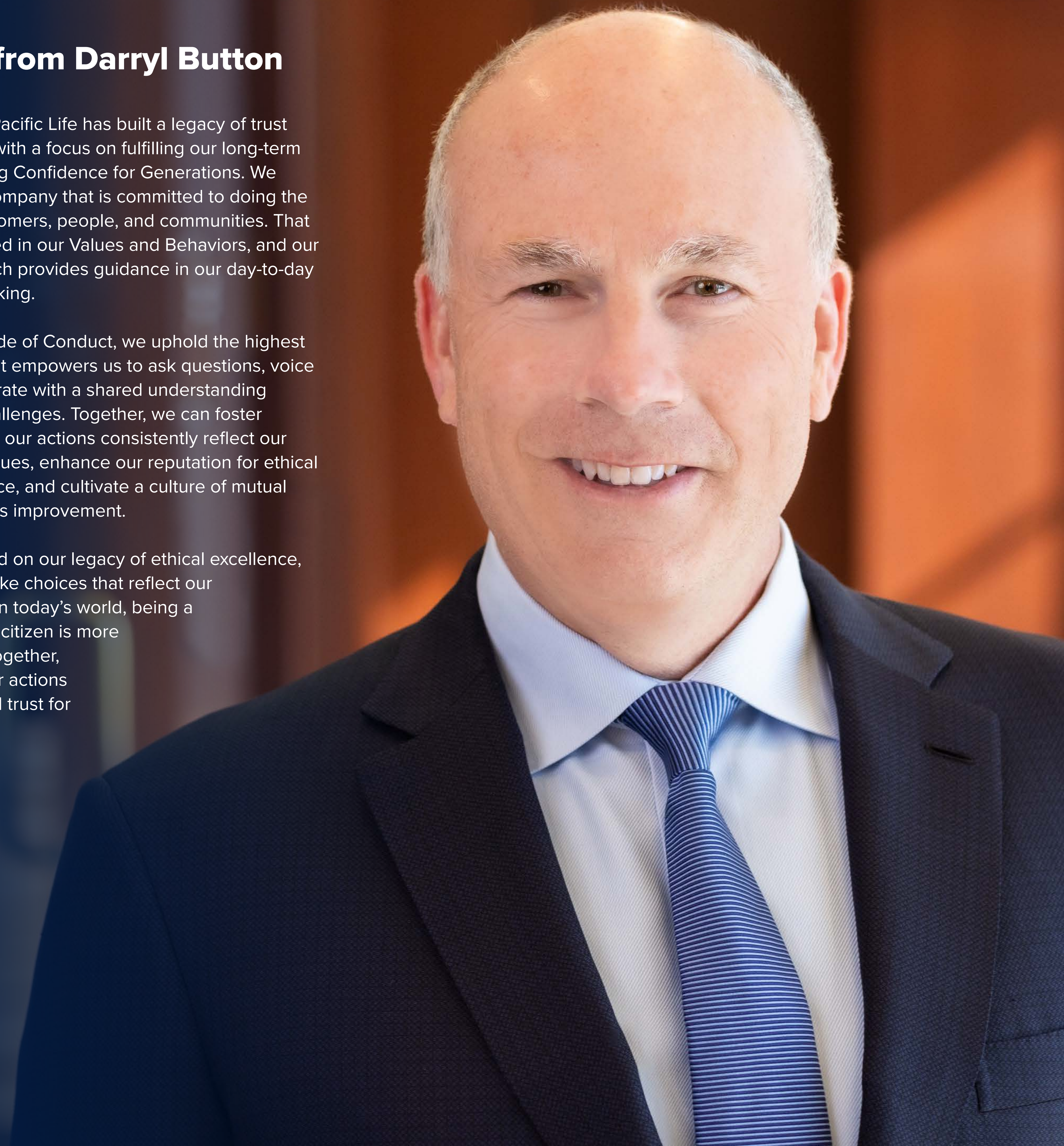
For nearly 160 years, Pacific Life has built a legacy of trust and financial security with a focus on fulfilling our long-term promises and providing Confidence for Generations. We are recognized as a company that is committed to doing the right thing for our customers, people, and communities. That commitment is reflected in our Values and Behaviors, and our Code of Conduct, which provides guidance in our day-to-day work and decision-making.

By adhering to our Code of Conduct, we uphold the highest standards of integrity. It empowers us to ask questions, voice concerns, and collaborate with a shared understanding of how to navigate challenges. Together, we can foster an environment where our actions consistently reflect our commitment to our Values, enhance our reputation for ethical behavior and excellence, and cultivate a culture of mutual respect and continuous improvement.

As we continue to build on our legacy of ethical excellence, I encourage you to make choices that reflect our collective dedication. In today's world, being a responsible corporate citizen is more important than ever. Together, we can ensure that our actions inspire confidence and trust for generations to come.



Darryl Button
President and CEO



INTRODUCTION

A Message from Darryl Button

Our Values

Compliance and Ethics Officer Message

Ethical Decision-Making

Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other

Safe and Healthy Workplace

Alcohol, Drugs, and Weapons

Speaking Up

Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing

Bribery and Fraud

Conflicts of Interest

Respect and our Business Partners

Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation

Communication in the 21st Century

Ethical Innovation and Use of AI

Consumer Privacy and Protecting our Assets

Data Storage, Management & Deletion

Using Resources Wisely

POLICIES

OUR VALUES

As a purpose-driven organization known for doing the right thing, our **VALUES** are the foundation that motivate and guide our actions. They are core to who we are and the standards that hold us accountable to our customers, people, and communities.



PEOPLE

Our people are our greatest asset. We continuously develop ourselves and empower each other, embracing our diverse perspectives, experiences and strengths, to actively contribute to our overall success.



INTEGRITY

We do the right thing for our customers, people, and communities and hold each other accountable for maintaining their trust in our promises.



COURAGE

We innovate and make Pacific Life stronger by seeking diverse perspectives, testing different ways of operating, and engaging in constructive debate.



PARTNERSHIP

Relationships are at the center of our business, and we work together as one team to meet the needs of our key stakeholders.



ENDURING STRENGTH

We take pride in being here for the long-term. Our financial strength, resilience, and risk mindset enables our customers to worry less and live more.

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



Compliance and Ethics Officer Message



Ethics and integrity are at the heart of Living the Pacific Life. By weaving these qualities into our daily decisions, we ensure that our customers are well cared for, regulators see us as partners, employees take pride in our purpose, and Pacific Life remains a strong and stable company offering long-term value.

As a Pacific Life employee, the choices you make and the values you embody are crucial to our success. Our team of compliance and ethics professionals at Pacific Life is here to support you in making ethical decisions with integrity and being the best that you can be. In return, we ask you to commit to acting in line with Pacific Life's values. Our goal is for the Code of Conduct to be a helpful tool in guiding your decisions. Growing in knowledge, asking questions, and learning from each other are key to our growth.

Our team is always here to discuss any questions or concerns. As the Chief Compliance & Ethics Officer, I am dedicated to listening, supporting, and helping you live the Pacific Life together.

Patricia Thompson
SVP, Chief Compliance & Ethics Officer



Who to Contact:

As employees, you may frequently encounter questions about various topics, including the Code of Conduct. Fortunately, there are numerous resources available to assist you with any questions.

- Coworkers
- Your manager
- HR Business Partners
- Employee Relations
- Compliance and Legal
- The Responsibility Line (for anonymity)

Additional Resources for
Reinsurance Division/International Employees:

- Local People Experience (PX) team
- Local Legal team

Please check the [Reporting Violations, Seeking Help, and Raising Concerns Policy](#) to confirm your responsibilities.



INTRODUCTION

- A Message from Darryl Button
- Our Values
- Compliance and Ethics Officer Message
- Ethical Decision-Making
- Leading with Integrity

EMPLOYEES AND THE WORKPLACE

- Respecting Each Other
- Safe and Healthy Workplace
- Alcohol, Drugs, and Weapons
- Speaking Up
- Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

- Doing the Right Thing
- Bribery and Fraud
- Conflicts of Interest
- Respect and our Business Partners
- Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

- Protecting our Reputation
- Communication in the 21st Century
- Ethical Innovation and Use of AI
- Consumer Privacy and Protecting our Assets
- Data Storage, Management & Deletion
- Using Resources Wisely

POLICIES

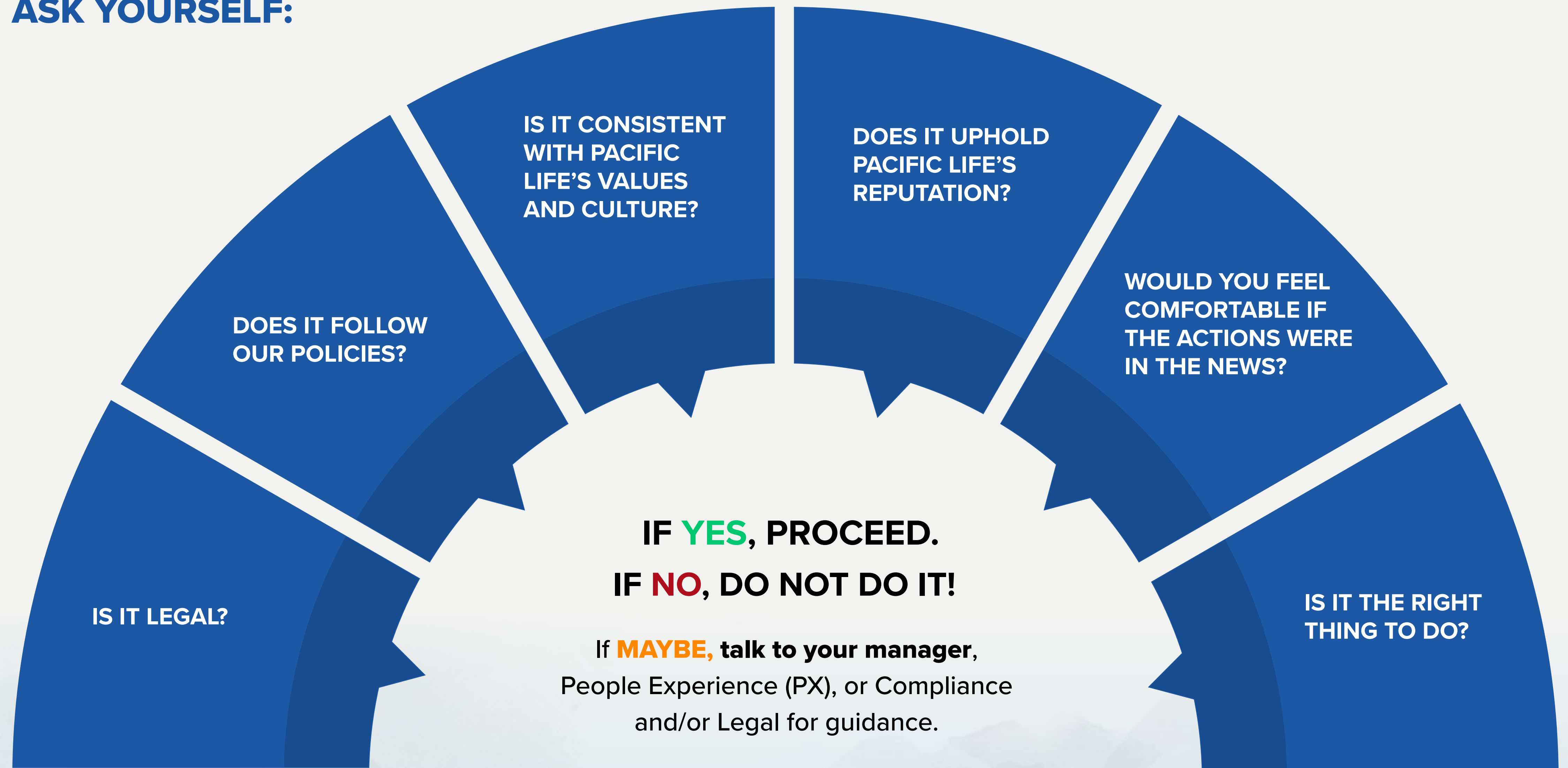


Ethical Decision-Making

When faced with an ethical dilemma, you have a responsibility to make the right action that complies with the law and our company policies, procedures, ethical standards, and values.



ASK YOURSELF:



You have an obligation to read, understand, and follow the Code of Conduct.

Violations are subject to discipline, which may include termination of employment and possible civil and criminal penalties.



INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

LEADING WITH INTEGRITY

Leading with **INTEGRITY** is a crucial foundation for Pacific Life to uphold our mission and provide “Confidence for Generations”. It fosters trust, accountability, and ethical behavior within our organization. It sets a positive example, ensuring that our individual actions align with our organization’s values and principles.



Why Does it Matter?

As a global organization, we are all guided by the same company values, behaviors, and ethical principles. These core elements form the foundation of our Code of Conduct and are essential to our collective success and integrity.

However, it is important to recognize that while most of the policies associated with our Code of Conduct apply across the organization, there will be situations where some policies may be specific based on lines of business, local or regional requirements, and regulatory jurisdictions.

Information about where to locate these policies is listed at the end of this Code of Conduct.

SHARED RESPONSIBILITIES:

- . Set the tone by demonstrating a willingness to listen and address concerns.
- . Be open to employees from other teams who may have concerns they wish to share with you and escalate appropriately.
- . Report alleged or possible violations of the Code of Conduct as soon as those situations are identified.
- . Work with Compliance or People Experience (PX), as appropriate, to take the proper course of action regarding compliance, ethical or integrity-related issues.
- . Never retaliate – or allow others to retaliate – against an employee who comes to you with a concern about alleged misconduct.

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



RESPECTING EACH OTHER

Pacific Life fosters a work environment that is challenging, inclusive, collaborative, and results oriented. We provide our **PEOPLE** equal employment opportunities for all applicants, employees, and contractors and provide respectful conditions that are free from harassment and discrimination.

Please check the [Equal Employment Opportunity Policy](#) for more details.

SAFE AND HEALTHY WORKPLACE

Pacific Life is committed to providing a safe and healthy work environment. Our culture of respect starts with our commitment to a workplace free from unlawful discrimination and harassment. In addition, threatening, abusive, and/or violent conduct is strictly prohibited.

Pacific Life is also committed to upholding and promoting human rights in all aspects of our operations. We recognize the fundamental importance of respecting and protecting the rights and dignity of every individual, and we strive to ensure that our actions and decisions reflect this commitment as reflected in the [Pacific Life Human Rights Policy](#).

Our company policies outline our commitment to implementing effective health and safety practices and complying with relevant laws and regulations.

Please check the [Workplace Safety Page](#) or the policies relating to your office for more information on environment, health and safety policies.

Please check our policies relating to [Preventing Harassment, Discrimination, and Retaliation Policy](#) to confirm your responsibilities.

ALCOHOL AND DRUGS

Reporting to work or engaging in Company business under the influence is prohibited.

Please check the [Drugs & Alcohol Policy](#) to confirm your responsibilities.

WEAPONS

Possession of weapons on Company property or at Company-sponsored events is prohibited. Possession includes carrying a weapon on your person, storing a weapon in your workspace, or storing a weapon in a vehicle parked on Company property. Weapons include all firearms, knives with blades over four inches, batons, and tasers.

Please check the [Workplace Violence & Weapons Policy](#) to confirm your responsibilities.

Why Does it Matter?

Workplaces that foster a positive culture, where employees feel supported and inspire one another, are inherently more productive, thereby enhancing the company's overall success. When employees treat each other with respect, gratitude, trust, and integrity, they not only boost job satisfaction but also attract the kind of colleagues we aspire to work alongside.

It Starts with Me: What Should I Do?

In cases of imminent danger, contact your local emergency service number then contact the [Global Security Operations Center \(GSOC\)](#).

Employees who believe they have experienced or witnessed conditions or behaviors in the workplace that could be unsafe or unhealthy should promptly report it to their manager, People Experience (PX), Employee Relations, or Compliance or Legal.

Employees who believe they have a drug or alcohol problem may seek counseling through Pacific Life's Employee Assistance Program (EAP).



INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



SPEAKING UP

Your voice is vital to Pacific Life. We rely on the honesty and integrity of our employees to come forward if they see something that doesn't seem right. Often, the only way we learn about concerns is through our employees. You are our front-line defense, and by speaking up, you protect Pacific Life's reputation and financial strength.

A good faith report, telling the truth as you know it, is an important part of your job at Pacific Life regardless of if you're an individual contributor or a manager.

BEING TRANSPARENT

Transparency is a key indicator of ethical decision making. At Pacific Life, living transparently is a shared responsibility between our employees and the company. We have an obligation to one another in order to make informed decisions.



Why Does it Matter?

Speaking up takes **COURAGE** and is an opportunity to recognize that you are not alone in dealing with issues. The Company has a process to help you address problems in the workplace. When official reporting of a possible violation of policy, conduct or the law is needed, it allows the Company to investigate and take appropriate action.

Pacific Life will not retaliate against any employee who reports a concern or participates in an investigation. Retaliation leads to poor culture and low morale among employees. Plus, in some cases, it's against the law. The Company does not tolerate retaliation of any kind when you report a concern in good faith or participate in an investigation.

Any sort of retaliation that accompanies a reported violation is not only against Pacific Life policy but is also against our value of **INTEGRITY**.

It Starts with Me: What Should I Do?

Speak up! Talk to your manager, your manager's manager, People Experience (PX), Compliance, or report it anonymously through the Responsibility Line. You can pick the one that you feel the most comfortable with or that you feel is most appropriate. There is no wrong way to speak up; the only mistake you can make is not to speak up at all.

INDIVIDUAL RESPONSIBILITIES:

- Raise concerns
- Ask for help
- Report violations

PACIFIC LIFE RESPONSIBILITIES:

- Educate
- Listen/Receive
- Investigate
- Address

For Reinsurance Division/International employees, contact your local People Experience (PX) Representative.

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



DOING THE RIGHT THING

Relationships are at the center of our business. We work together as one team to meet the needs of our key stakeholders. When we prioritize our customers, business partners, and co-workers, our decisions will also be good for the company. Our actions exemplify the values of Living the Pacific Life and demonstrate our commitment to **PARTNERSHIP**.

Doing the right thing is always the right thing!

BRIBERY

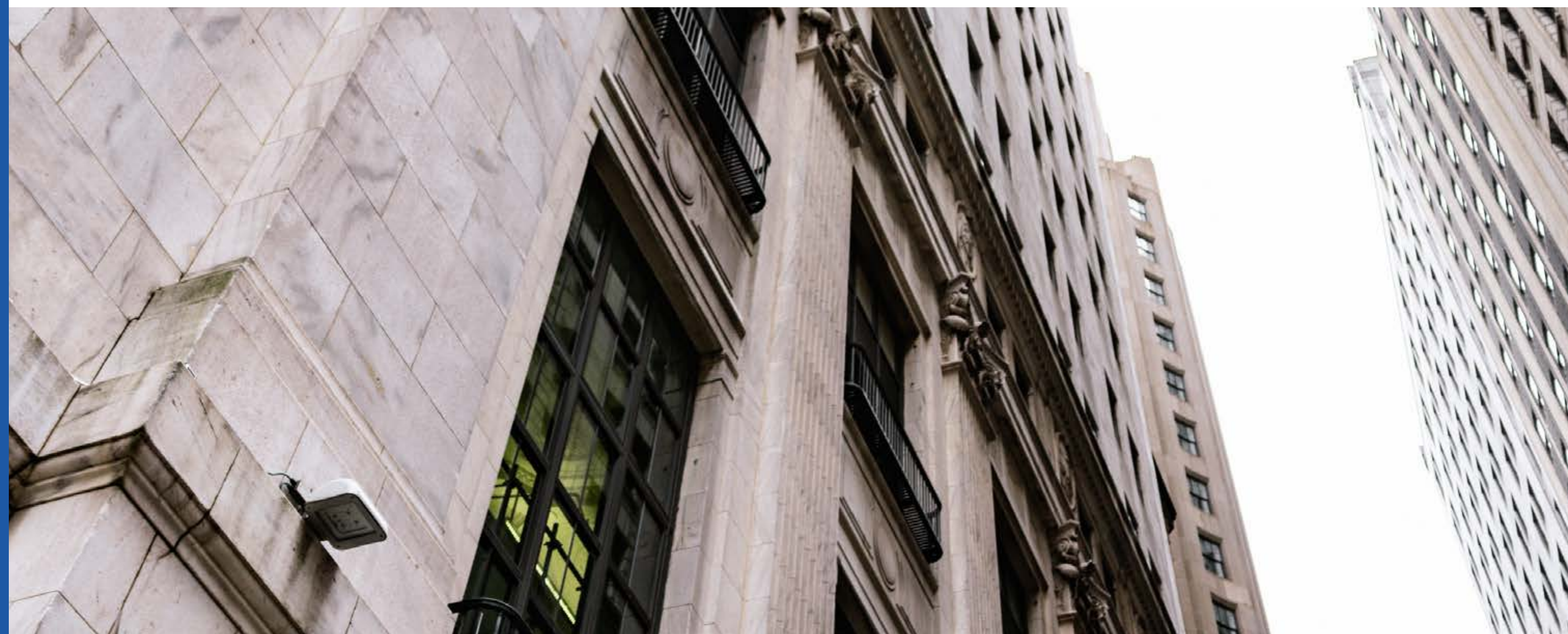
Bribery is offering, providing, or receiving anything of value to gain an unfair advantage. Bribery is illegal and has strict penalties that can damage our reputation and trust with customers and third parties.

Please check the [Gifts & Anti-Bribery Policy](#) to confirm your responsibilities.

FRAUD

Fraud is the intentional misrepresentation or omission of facts to obtain something that would not have been provided without the deception.

Please check the [Anti-Fraud Policy](#) to confirm your responsibilities.



Why Does it Matter?

Anyone can make an honest mistake at work. Fraud and bribery, on the other hand, involve deliberate deception. In addition to being illegal, bribery and fraud risk undermining our reputation, the trust we strive to build every day and can erode free and fair competition. These violate our values and our commitment to honesty, integrity, and trustworthiness.

We cannot maintain our long-earned reputation for ethical business conduct if we engage in acts of fraud or bribery. Fraud and bribery are illegal and carry substantial civil and criminal penalties.

It Starts with Me: What Should I Do?

- Be aware of and raise questions if you see red flags or hints that any of the following prohibited activities are occurring:
- Theft of company assets
- Embezzlement of company or client funds
- Forgery or alteration of company documents
- Authorizing or submitting a reimbursement request known to be false
- Misrepresentation of facts pertaining to an insurance transaction
- An offer, promise, authorization, payment, gift, solicitation, or acceptance of anything of value to or from any government official or private person to improperly gain any regulatory, commercial, or contractual advantage

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

CONFLICTS OF INTEREST

Conflicts of interest can arise when your personal interests or activities might conflict with Pacific Life's interests or activities. It can harm Pacific Life's business dealings and damage our reputation with business partners, vendors, customers, and employees. It can include a personal outside activity, personal relationship, or financial matters.

Gifts and gratuities, a normal gesture of goodwill and appreciation, can also cross the line from a common courtesy to a conflict of interest.

Please check the [Conflicts of Interest Policy](#) to confirm your responsibilities.



Why Does it Matter?

On the outside, conflicts of interest may look like good partnerships, close relationships and putting others ahead of self. As employees of Pacific Life, we have a duty to the company and to our customers to ensure that the decisions we make on behalf of the company don't put other commitments or relationships first.

HAVING A PERSONAL RELATIONSHIP WITH ANOTHER PACIFIC LIFE EMPLOYEE:

At Pacific Life, we are committed to maintaining a workplace that is fair, objective, and free from favoritism. Nepotism—favoring relatives or close personal relationships in employment decisions—can undermine trust, damage morale, and create actual or perceived conflicts of interest.

It Starts with Me: What Should I Do?

A good way to protect against personal conflicts interfering with Pacific Life decisions is to ensure that you aren't the only one who knows about the relationships you have with other businesses, people or the incentives that might influence your decisions.

Please refer to the [Conflicts of Interest Policy](#) for more information on disclosure requirements.

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

RESPECT AND OUR BUSINESS PARTNERS

Trust and mutual respect are the foundations of a great working relationship. It's just as important to respect our customers and business partners as we do our coworkers. After all, can you trust a company that you don't respect? We expect the highest **INTEGRITY** from those with whom we partner. Our *Third-Party Code of Conduct* provides guidance and resources to our business partners.

INSIDER TRADING AND MARKET ABUSE

Financial markets are designed to ensure that all participants have an equal opportunity to succeed. When an employee uses or shares confidential information to trade securities of a business partner for personal gain, it undermines this fairness. This practice, known as insider trading, not only violates our ethical standards but is also illegal.

Please check the *Insider Trading Policy* to confirm your responsibilities.



Why Does it Matter?

Treating others respectfully and fairly is doing the right thing. Fairness to competitors, customers, and others means that we treat everyone equally when offering our products and services. We do this not only to illustrate our values but also to comply with unfair competition laws.

It Starts with Me: What Should I Do?

Never make false or misleading statements about competitors or their products and services.

To support fair competition in the marketplace, the following are prohibited:

- Requiring a producer to agree to an arrangement as a condition for further business
- Illegally obtaining confidential information about a competitor (or any other third party)
- Participating in price rigging or boycotting a third party
- Trading in the securities of any publicly traded company with inside information
- Disclosing non-public information

Please check the *Antitrust and Unfair Competition Policy* to confirm your responsibilities.

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



PROTECTING OUR REPUTATION

For nearly 160 years, Pacific Life has focused on doing what's right for our customers. When our customers purchase life and retirement products, they're buying a promise that today, tomorrow, or ten years from now, Pacific Life will still be there. Our customers trust us and our **ENDURING STRENGTH** to protect their families, businesses, and futures.

Pacific Life's reputation is the collective perception of our character by others. It encompasses our actions, culture, and citizenship. In essence, it boils down to whether the public views us as trusted partners. You play a crucial role in safeguarding our reputation through your daily decisions.

Both individuals and leaders are vital to maintaining Pacific Life's ethical standing. Being part of a reputable company means having the **COURAGE** to speak up when you notice something amiss and asking questions when in doubt.



Why Does it Matter?

Pacific Life's reputation is one of our most valuable assets. Our positive reputation attracts clients and investors and establishes goodwill with the regulators who are charged with overseeing our business. Reputational harm can have an extensive and lasting impact to the Company seen in lost business opportunities, time, money, and resources needed to rebuild the public's trust.

It Starts with Me: What Should I Do?

Do the right thing! As employees, we are empowered with protecting our reputation regardless of the methods we use to communicate. As you engage with new methods of communication, be thoughtful, respectful and protective of each other, our assets and our reputation just as if you are communicating through more traditional means.



INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

COMMUNICATION IN THE 21ST CENTURY

In today's fast-paced world, we are constantly introduced to new technologies and methods of communication. Whether it's the latest social media platform or innovative electronic communication tools, our company and employees navigate the challenges and seize the opportunities presented by these ever-evolving communication methods.

Please check the [Social Media Policy](#) to confirm your responsibility.



Why Does it Matter?

Our commitment and responsibility to high standards of ethical conduct and compliance with laws, regulations, and Pacific Life policies do not change with the changing environment. We must bring along our values, principles, and policies as our compass and our map to guide us in doing the right thing.

It Starts with Me: What Should I Do?

Apply the same standards of ethical and professional conduct regardless of how you are communicating. All our values, behaviors, principles, and policies apply to all forms of communication.

Social media plays a valuable role in connecting and engaging with people. When you express your personal thoughts or views, including messages posted on social media, make sure that you are not speaking on behalf of Pacific Life.



INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

ETHICAL INNOVATION

The innovative mindset, actively seeking opportunities, is an important and exciting focus for Pacific Life's employees and our future growth. Incorporating our ethics and values into the innovation process, fosters an environment that strengthens our long-term strategies.

USE OF AI

At Pacific Life, we are committed to the ethical and responsible use of AI technologies. We recognize the transformative potential of AI in enhancing customer experience, productivity, and creativity. However, we also acknowledge the importance of taking steps to help ensure that these technologies are used in a manner that aligns with our values and ethical standards.

Please check the [Generative Artificial Intelligence \(Gen AI\) Hub](#) and refer to the [Secure Usage Guidelines](#) to confirm your responsibilities.



Why Does it Matter?

Innovation can drive value for Pacific Life today, while also helping position Pacific Life to be successful for the next 160 years. The dynamic business environment that we operate in and our focus on creating a long-term, sustainable strategy means that innovation must be an integral part of our business objectives and processes. As employees, we must be open-minded and incorporate sound business practices and good decision making into the core of each project.

It Starts with Me: What Should I Do?

Core to all innovation is having a clear and deep understanding of and strong desire to meet the needs of our customers and the willingness to always improve.

- Be empathetic to the needs of your customer – whether they're a consumer, financial professional, colleague or someone else, – we can always serve them better
- Be collaborative – find coworkers with diverse perspectives and brainstorm how to improve
- Challenge the status quo and be open to new ways of working. Innovation is change and change can be hard; however, we must always work to avoid defaulting to our comfort zones
- Bring a prototype of a new solution / way of working to your customers and be open to feedback. Not all innovation will hit the mark the first time, but through an iterative process it can be improved
- Engage compliance, legal and risk resources on issue spotting and solution development

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES



CONSUMER PRIVACY AND PROTECTING OUR ASSETS

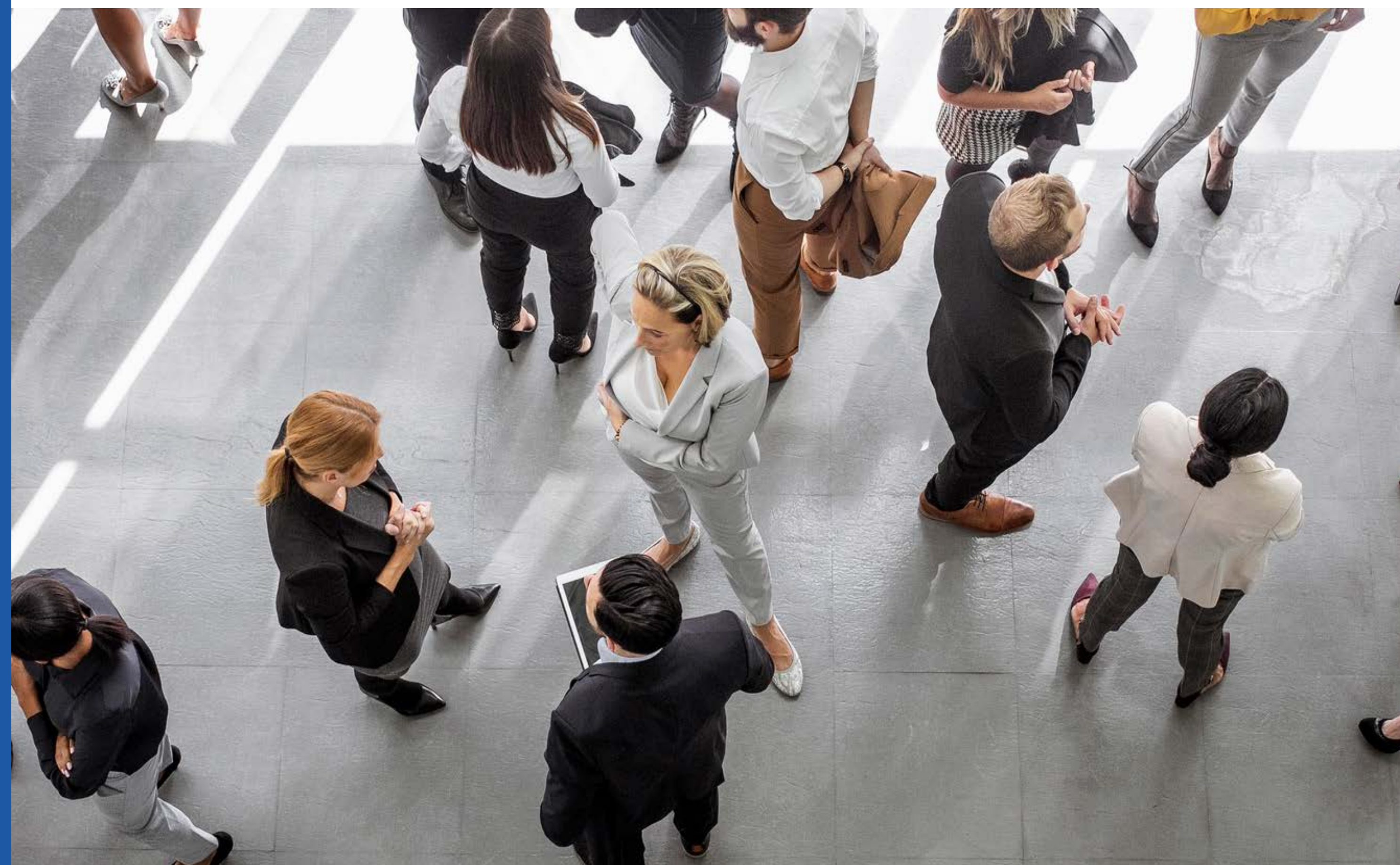
Pacific Life maintains a wide variety of sensitive and confidential information. Technical definitions vary, but for our purposes, it is easiest to think of all personal information, confidential business information, and company records as Pacific Life property and assets.

DATA STORAGE, MANAGEMENT & DELETION

Data, much like water can seep into every corner of our environment. This can create challenges in protecting personal and confidential information and also in managing or deleting information that Pacific Life no longer needs. To address these challenges, it is crucial to follow the Company's Information Management policies and use approved locations for data storage. Only delete information that is not required to be maintained or needed to conduct Pacific Life Business.

Additionally, please check the [Information Lifecycle Management Policy](#) to confirm your responsibilities.

Please check the [Operational Risk & Resilience \(OR&R\) Page](#) for more information on our BeSAFE program.



Why Does it Matter?

As individuals, we care about protecting our personal information from inappropriate use. As employees of Pacific Life, we promise to protect our customers' and business partners' information too. Customers trust us to protect what matters most to them, and our financial strength and reputation rely on it.

It Starts with Me: What Should I Do?

Your role at Pacific Life includes the obligation to protect and keep non-public information confidential. Follow the policies and procedures designed specifically for your department and access level. When in doubt, ask questions before you disclose information.

TO PROTECT OUR BUSINESS AND CUSTOMER INFORMATION:

- Encrypt emails containing non-public information when sent outside of Pacific Life.
- Do not store non-public information on a mobile computing device unless it is necessary to perform your job and the device is approved, protected, and managed by Pacific Life.
- Do not display or leave confidential information in plain view. After business hours, non-public information must be stored in cabinets, bins, or drawers.
- Dispose of non-public information in locked bins marked "Confidential".
- Do not share confidential business information such as trade secrets and product pricing with any unauthorized party or employee that does not need the information.

Please check the [Protection and Proper Use of Confidential and Restricted Information Policy](#) to confirm your responsibility.

INTRODUCTION

A Message from Darryl Button

Our Values

Compliance and Ethics Officer Message

Ethical Decision-Making

Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other

Safe and Healthy Workplace

Alcohol, Drugs, and Weapons

Speaking Up

Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing

Bribery and Fraud

Conflicts of Interest

Respect and our Business Partners

Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation

Communication in the 21st Century

Ethical Innovation and Use of AI

Consumer Privacy and Protecting our Assets

Data Storage, Management & Deletion

Using Resources Wisely

POLICIES

USING RESOURCES WISELY

Use of Company resources helps to ensure our **ENDURING STRENGTH** and longevity. Wise use of resources can mean a lot of different things. It may be as simple as leaving a lighter footprint by thinking before printing or being thoughtful about budgets. You can also be a good steward of company resources by asking probing questions, spending time checking your work, collaborating with other employees to understand risks and implementing actions we can take to appropriately protect the company. Company resources are provided for our use in conducting Pacific Life business. In doing our daily work, we effectively bring together many types of systems, information, hardware and employee time.

Employees make Pacific Life financially strong by ensuring that we use and combine all these resources, wisely and ethically.



It Starts with Me: What Should I Do?

CONSIDER ASKING THE “6 W’S” WHEN USING COMPANY RESOURCES:

- 1 WHO** needs to be involved in this task?
- 2 WHAT** is the purpose of the task?
- 3 WHERE** should resources be located?
- 4 WHEN** does the task need to be completed, or decision need to be made?
- 5 WHY** is this resource the best way to complete this task?
- 6 WHAT** is the risk to the Company if assigned tasks are not completed as expected and/or mistakes are made?

INTRODUCTION

A Message from Darryl Button
Our Values
Compliance and Ethics Officer Message
Ethical Decision-Making
Leading with Integrity

EMPLOYEES AND THE WORKPLACE

Respecting Each Other
Safe and Healthy Workplace
Alcohol, Drugs, and Weapons
Speaking Up
Being Transparent

WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

Doing the Right Thing
Bribery and Fraud
Conflicts of Interest
Respect and our Business Partners
Insider Trading and Market Abuse

TRUST, TECHNOLOGY AND RESPONSIBILITY

Protecting our Reputation
Communication in the 21st Century
Ethical Innovation and Use of AI
Consumer Privacy and Protecting our Assets
Data Storage, Management & Deletion
Using Resources Wisely

POLICIES

OUR POLICIES

- **Anti-Fraud**
- **Antitrust and Unfair Competition**
- **Conflicts of Interest**
- **Drugs & Alcohol**
- **Equal Employment Opportunity**
- **Gifts and Anti-Bribery**
- **Information Lifecycle Management**
- **Insider Trading**
- **Preventing Harassment, Discrimination, and Retaliation**
- **Protection and Proper Use of Confidential and Restricted Information**
- **Reporting Violations, Seeking Help, and Raising Concerns**
- **Social Media**
- **Workplace Violence & Weapons**



It is crucial for employees to be aware of any additional policies or requirements that may apply to them outside of the global policies.

For policies that apply globally and/or are specific to U.S. employees, please visit the *Enterprise Compliance Splash* page for a list of those policies.

For policies that are specific to the Reinsurance Division and International employees, please go to the *PL Re Policies and Procedures* page on Splash.

We appreciate your understanding and adherence to these guidelines, ensuring that we maintain our high standards of conduct and compliance in every location and context in which we operate.